To: Rao, Kate[Rao.kate@epa.gov]

From: Dermer, Michele

Sent: Tue 7/14/2015 4:00:45 PM

Subject: RE: DRAFT CA UIC Desk Statement re: July 15th deliverable

We have a meeting at 10 to prepare and go over our meeting yesterday. You are welcome to join. I'll forward the invite.

From: Rao, Kate

Sent: Tuesday, July 14, 2015 8:55 AM

To: Dermer, Michele

Subject: RE: DRAFT CA UIC Desk Statement re: July 15th deliverable

Ha ha. No. Mike didn't see your comments and when I brought it up this morning he said to go with what we have and we can change it, per your suggestions, if we need to. I am hoping we can talk about it before/after the 11 am update.

Kate Rao Drinking Water Protection Section (WTR 3-2) USEPA Region 9 75 Hawthorne St., San Francisco, CA 94105 tel: (415) 972-3533 / fax: (415) 947-3549

From: Dermer, Michele

Sent: Tuesday, July 14, 2015 8:42 AM

To: Rao, Kate

Subject: RE: DRAFT CA UIC Desk Statement re: July 15th deliverable

Are you picking on me?

From: Rao, Kate

Sent: Tuesday, July 14, 2015 8:28 AM

To: Dermer, Michele Subject: FW: DRAFT CA UIC Desk Statement re: July 15th deliverable
Hi Michele – I didn't incorporate the edits you provided. I would like to discuss with you.
Thanks. Kate

From: Rao, Kate Sent: Tuesday, July 14, 2015 8:27 AM To: Montgomery, Michael; Albright, David; Engelman, Alexa; Moffatt, Brett; McWhirter, Lisa; Dermer, Michele; Mogharabi, Nahal Cc: Keener, Bill Subject: RE: DRAFT CA UIC Desk Statement re: July 15th deliverable
CA UIC Team –
Attached is revised draft of desk statement which incorporates final edits from Mike. I can make additional edits as needed after the UIC update with Jared at 11 am today.
Kate

75 Hawthorne St., San Francisco, CA 94105 tel: (415) 972-3533 / fax: (415) 947-3549

From: Rao, Kate

Sent: Thursday, July 09, 2015 12:00 PM

To: Montgomery, Michael; Albright, David; Engelman, Alexa; Moffatt, Brett; McWhirter, Lisa;

Dermer, Michele; Mogharabi, Nahal

Subject: DRAFT CA UIC Desk Statement re: July 15th deliverable

Mike et al –

Attached is the draft desk statement. Please provide me your thoughts/edits/comments. Lisa and Alexa provided me some initial input which is incorporated in the draft.

We have not been updating the CA UIC webpage (http://www.epa.gov/region9/mediacenter/uic-review/index.html) to include discussions on milestones. However, we may want to refresh the Qs and As. I will discuss with Lisa next week. We will add the July 15th letter we get from the state under the RESOURCES box.

Note: the May 15th desk statement is below. We did not get any media inquiries so it never went out.

Kate

Kate Rao Drinking Water Protection Section (WTR 3-2) USEPA Region 9 75 Hawthorne St., San Francisco, CA 94105 tel: (415) 972-3533 / fax: (415) 947-3549

From: Rao, Kate

Sent: Monday, May 18, 2015 2:03 PM

To: Montgomery, Michael; Albright, David; Dermer, Michael; Zito, Kelly; Keener, Bill;

Mogharabi, Nahal; Skadowski, Suzanne

Cc: Maier, Brent

Subject: CA UIC Desk Statement re: May 15th deliverable

Below is final desk statement. Includes edits by OPA and has correct link to DOGGR webpage with May 15th material.

U.S. EPA is continuing its review of California's Division of Oil, Gas and Geothermal Resources' (DOGGR) Class II Underground Injection Control primacy program, including the state's implementation of the Class II UIC program, the identification of Class II injection wells that may be injecting into non-exempt aquifers, the state's ongoing assessment of drinking water sources that may be impacted by improper injection, and the establishment of an effective process for reviewing and approving aquifer exemptions in California. EPA's December 22, 2014, letter directed the state to submit a Program Revision Plan by February 6, 2015. After reviewing the state's plan, and based on further discussion with the state agencies, EPA issued a letter to the state on March 9, 2015 concurring on key aspects of the state's plan and setting out a schedule of required activities and deliverables, with target milestones and compliance deadlines to ensure that the state continues to make progress towards full compliance with the Safe Drinking Water Act, and meets a February 15, 2017 compliance deadline for Class II wells currently injecting into non-exempt aquifers.

On May 15, 2015, EPA received the state's submittal in accordance with the timeframe set forth in EPA's March 9, 2015 California Class II UIC Program Corrective Action Plan Schedule, which required:

- completed evaluations for "Category 1" injection wells (this is the state's review of the Class II water disposal wells injecting into non-exempt, non-hydrocarbon-bearing aquifers and the 11 aquifers historically treated as exempt); and
- a revised Enclosure B of the State's February 6, 2015 letter to incorporate cyclic steam wells and provide a schedule for completing a review of these wells and submission of proposed aquifer exemptions, as applicable, to meet the February 15, 2017 compliance deadline.

EPA is reviewing the submitted material, which is publicly available on the state's website at: http://www.conservation.ca.gov/dog/general_information/Pages/UndergroundInjectionControl(UIC).aspx. After completing our review over the next few weeks, EPA expects to provide a written response to the state regarding the information it submitted.

EPA will continue our oversight of the state's efforts to ensure that California's Class II UIC program is in compliance with the Safe Drinking Water Act. To access information about EPA's review of CA's UIC program, please visit: http://www.epa.gov/region9/mediacenter/uic-review/index.html.

Kate Rao Drinking Water Protection Section (WTR 3-2) USEPA Region 9 75 Hawthorne St., San Francisco, CA 94105 tel: (415) 972-3533 / fax: (415) 947-3549